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7	
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8	

SANTANA CLINE

dba The Dark Monkey,

# UNITED STATES DISTRICT COURT

#### DISTRICT OF NEVADA

Plaintiff,
v.
ETSY, INC.; ELLIOT FISHER; BRAD CAMPDEN; JENNIFER MOUNTAIN DENTZ; DT FASHION, LLC; PETER EZANIDIS; MARIA WALKER; JOHN DOE 1-1000, et al.

Defendants.

Case No. 2:15-cv-02115-JCM-VCF

STIPULATION AND ORDER EXTENDING DEFENDANT ETSY, INC.'S DEADLINE TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT

[FIRST REQUEST]

Pursuant to Local Rules 6-2 and 7-1, the parties hereto, by and through the undersigned, hereby STIPULATE that the deadline for Defendant Etsy, Inc. ("Etsy") to respond to Plaintiff Santana Cline d/b/a/ Dark Monkey's ("Cline") Amended Complaint is extended to and through Monday, January 18, 2016.

Cline served Etsy with a copy of the Amended Complaint on November 30, 2015. Accordingly, the current deadline for Etsy to file its response is December 21, 2015. Etsy recently retained Nevada counsel in this matter. Because of the holidays and the travel associated therewith, Etsy's counsel will not have time to conduct the reasonable inquiry required by FRCP 11 before the current deadline.

### Case 2:15-cv-02115-JCM-VCF Document 12 Filed 12/21/15 Page 2 of 3

MCDONALD · CARANO · WILSON LLP 2300 WEST SAFARA AVENUE-SUITE 1200 · LAS VEGAS, NEVADA PHONE (702)873-4100 · FAX (702) 873-9966

The stipulation is entered in good faith and not for purposes of delay. The parties have not requested any previous extensions of time for Etsy to respond to the amended complaint.

RESPECTFULLY SUBMITTED this 21st day of December, 2015.

PLAINTIFF McDONALD CARANO WILSON LLP

 By: /s/ Santana J. Cline
 By: /s/ Rory T. Kay

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Attorneys for Defendant Etsy, Inc.

#### IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

an Facher

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of McDonald Carano Wilson LLP, and that on the 21st day of December, 2015, I served a true and correct copy of the foregoing STIPULATION AND ORDER EXTENDING DEFENDANT ETSY, INC.'S DEADLINE TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT

# [FIRST REQUEST]

by depositing said copies in the United States Mail, postage prepaid thereon, and via electronic mail upon the following:

Santana Cline 8243 Chippenham Drive Dublin, Ohio 43016 pro se

/s/ Sally Wexler

An employee of McDonald Carano Wilson LLP